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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

Valentino Dimitrov, individually, and on
behalf of all others similarly situated;

Plaintiffs,

vs.

Stavatti Aerospace, Ltd, a Minnesota
corporation; Stavatti Aerospace, Ltd, a
Wyoming corporation; Stavatti
Corporation, a Minnesota corporation;
Stavatti Immobiliare, Ltd, a Wyoming
corporation; Stavatti Industries, Ltd, a
Wyoming corporation; Stavatti Niagara,
Ltd, a New York corporation Stavatti
Super Fulcrum, Ltd, a Wyoming
corporation; Stavatti Ukraine, a Ukrainian
business entity; Stavatti Heavy Industries
Ltd, a Hawaii corporation; Christopher
Beskar and Maja Beskar, husband and
wife; John Simon and Jean Simon,
husband and wife; William Mcewn and
Patricia Mcewen, husband wife; Rudy
Chacon and Jane Doe Chacon, husband
and wife; and DOES 1 through 10,
inclusive,

Defendants.

Case No.: CV-23-00226-PHX-DJH

**DECLARATION OF PLAINTIFF
VALENTINO DIMITROV IN SUPPORT
OF MOTION FOR ENTRY OF
DEFAULT JUDGMENT AGAINST
STAVATTI CORPORATION,
CHRISTOPHER BESKAR, PATRICIA
MCEWEN, WILLIAM MCEWEN AND
JEAN SIMON**

I, Valentino Dimitrov, declare under penalty of perjury that the following is true

1 and correct:

2 1. I am the Plaintiff in this matter.

3 2. All statements in the Complaint are true.

4 3. All exhibits attached to the Complaint are accurate.

5 4. I am a hard-working individual who invests and loans money to businesses.

6 5. In February of 2022, I loaned Defendants \$1,000,000 based on false
7 representations and assertions by Defendants, primarily Christopher Beskar. The
8 Defendants intended for me to rely on their misrepresentations.

9 6. The Defendants made me believe that I would receive my \$1,000,000 back
10 from them, as well as a \$5,000,000 profit distribution.

11 7. Upon information and belief, Defendant Christopher Beskar is the
12 ringleader of Defendant Stavatti Aerospace, Ltd. Defendant Stavatti Aerospace, Ltd is a
13 Ponzi scheme that does not conduct legitimate business. All of the named Defendant
14 entities are subsidiaries of Stavatti Aerospace, Ltd. All of the named Defendants are
15 participating in Defendants' Ponzi scheme either through the named Defendant entities.

16 8. Upon information and belief, Christopher Beskar oversees and manages all
17 of the named Defendant individuals (or their spouses) and Defendant entities. He used the
18 same individuals and entities to defraud me. He personally asserted material
19 misrepresentations to me. He misrepresented, among other things, that Stavatti Aerospace
20 and its subsidiaries were legitimate aerospace corporations actively involved in investing
21 in the same.

22 9. Upon information and belief, Defendant Stavatti Corporation is a Ponzi
23 scheme that does not conduct legitimate business and its only purpose is to scam and
24 defraud unsuspecting victims. William Mcewen is the Chief Operating Officer of Stavatti
25 Niagara, a "subsidiary" of Defendant Stavatti Aerospace Ltd. William Mcewen
26

1 participated in defrauding me and he acted on behalf of his marital community when he
2 did so. Jean Simon is the spouse of John Simon. The faux marketing materials provided
3 to me by the Defendants represent John Simon as the CEO of Stavatti Niagara, a
4 subsidiary of Stavatti Corporation.

5 10. I understand that all of the Defendants are operating a Ponzi scheme and
6 they all worked in concert to defraud me.

7 11. I understand that all named Defendants entities are business entities that are
8 subsidiaries of Defendant Stavatti Aerospace, Ltd.

9 12. Christopher Beskar was acting on behalf of all named Defendant entities
10 when he defrauded me as he represented that he was oversaw all of the same.

11 13. Defendants have never returned any of the money I loaned to them.

12 14. I am damaged, at least, in the amount of \$6,000,000.

13 15. I understand Defendants have been evading service in this action. I
14 understand that the Defendants have failed to respond to this lawsuit.

15 16. I respectfully ask that you hold Stavatti Corporation; Christopher Beskar;
16 Patricia Mcewen and William Mcewen; and Jean Simon jointly and severally liable for
17 the \$6,000,000 damages I have suffered.

18
19 I certify under the penalty of perjury that the foregoing is true and correct to the
20 best of my knowledge, information, and belief.

21
22 EXECUTED this 3rd day of July, 2023.

23
24 **ENARA LAW, PLLC**

25 By: /s/ Valentino Dimitrov
26 Valentino Dimitrov



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